

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554

In the Matter of Docket #
No. 04-160

June 18, 2004

Now comes Randal J. Miller, owner of the Miller Media Group Radio Stations, which include:

Miller Communications, Inc., licensee of WTIM-FM Taylorville, IL and WMKR(FM) Pana, IL; Kaskaskia Broadcasting, Inc., licensee of WRAN(FM) Tower Hill, IL; and Virden Broadcasting Corp., licensee of WKEI(AM)-WYEC(FM) Kewanee, IL, WJRE(FM) Galva, IL, and WGEN(AM) Geneseo, IL.

As an owner of 7 small market radio stations in Illinois, I strenuously object to the Federal Communications Commission (FCC) allowing any satellite radio service, to provide local programming around the country.

In granting licenses for satellite radio, the FCC relied on the express promises by XM Radio Inc. ("XM") and Sirius Satellite Radio Inc. ("Sirius") that their service would be national-only. They would provide multiple foreign language programming, senior citizens and children's programming, etc.

Because satellite radio would be national, local broadcasters would not be harmed.

Now XM and Sirius have blatantly broken their promises, launching "localized" traffic and weather service in the top twenty-one markets. This is only the beginning.

It is clear from the comments they filed in opposition to the NAB Petition that XM and Sirius view the sky as the limit ? with technology to continue to "localize" their services they can make their formats virtually indistinguishable from local radio.

Without FCC intervention, two companies, with 120 channels each, will reach into every market and try to mimic what local broadcasters do.

Our group of radio stations provides **extensive local news coverage, emergency weather information, and public affairs programming every hour of every day, 7 days a week.** To provide these services, it takes having a sufficient audience with which to offer local advertisers. A lessening of our local audience base that satellite radio is proposing, will erode our ability to sell local advertising, which will in turn hurt the local service we provide our small communities thru-out northwest and central Illinois.

Satellite Radio doesn't have public interest limits or ownership limits. They have no local investment in their communities.

The \$9.6 billion broadcasters gave to their local communities in 2003 speaks volumes to our commitment to public service.

The biggest expense our group of stations has, is its PEOPLE. It takes lots of PEOPLE to provide good, locally based, community service radio in our communities. Lessening our audience, as satellite radio is proposing, potentially will lessen our ability to sell advertising—the only way we have of paying the bills and possibly make a profit—which means PEOPLE will have to be fired, and that means LESSENING of the community service our stations now provide.

In each of our cluster of stations, we have 3 to 4 full-time programming people, which are responsible for local news, local weather, and high school sports play by play coverage. This is considered a LARGE programming staff in small market radio. This kind of service may not be possible if our audience is eroded by satellite radio.

FCC, in authorizing satellite radio, vowed to protect "vibrant" local broadcasting, and promised to take "any necessary action to safeguard the important service that terrestrial radio provides." That time is now.

Before XM and Sirius invest millions of dollars in technology, and further raise consumer's expectations about their ability to receive specific content, the FCC must clarify it authorized a national-only satellite radio service.

The Miller Media Group Radio Stations wholeheartedly supports the NAB Petition.